

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-against-

RARE BREED TRIGGERS, LLC; RARE
BREED FIREARMS, LLC; LAWRENCE
DEMONICO; KEVIN MAXWELL,

Defendants.

Case No. 1:23-cv-00369-NRM-RML

STIPULATION AND ORDER

Concerning (a) documents received from the United Parcel Service, Inc. (“UPS”) in response to Plaintiff United States of America’s February 16, 2023, Subpoena, and (b) documents received from Chase Paymentech LLC (“Chase Paymentech”) in response to Plaintiff’s April 5, 2023, Subpoena in the present litigation, the parties stipulate and agree that Plaintiff will treat the subpoenaed documents provided by UPS (“UPS Records”) pursuant to the United States’ February 16, 2023 Subpoena (“UPS Records”) and the subpoenaed documents provided by Chase Paymentech (“Chase Paymentech Records”) as follows:

1. Plaintiff will not use the information contained in the UPS Records to identify any currently unidentified person named therein for any purpose, subject to the provisions below;
2. Plaintiff will not contact any person who is identified in the UPS Records unless Plaintiff has identified that person as an individual who may have been a purchaser of FRT-15s or Wide Open Triggers (“WOTs”) independent of the UPS Records;
3. Plaintiff will not use any personal identifying information from the UPS Records unless Plaintiff has identified that person as an individual who may have been a purchaser of FRT-15s or WOTs independent of the UPS Records;

4. Plaintiff will not use the credit card account numbers contained in the Chase Paymentech Records to attempt to identify any persons associated with any of the information in the Chase Paymentech Records.

5. This Stipulation and Order does not, in any way, limit the United States' ability to investigate any purchases of FRT-15s or WOTs independent of the UPS Records or Chase Paymentech Records.

6. The parties may seek to modify or vacate this Stipulation and Order at any time.

BREON PEACE
United States Attorney
271 Cadman Plaza East
Brooklyn, New York 11201
MICHAEL
BLUME

Digitally signed by
MICHAEL BLUME
Date: 2023.06.27 16:15:08
+04'00'

Michael Blume
Paulina Stamatelos
Assistant U.S. Attorneys
(718) 254-6479 / 6198
Michael.Blume@usdoj.gov
Pauline.Stamatelos@usdoj.gov

Attorneys for Plaintiff

DHILLON LAW GROUP INC.
50 Park Place
Suite 1105
Newark, NJ 07102

David A. Warrington (PHV)
Michael A. Columbo (admission forthcoming)
Josiah Contarino
917-423-7221
dwarrington@dhillonlaw.com
mcolumbo@dhillonlaw.com
jcontarino@dhillonlaw.com

Attorneys for Defendants

SO ORDERED:

This ____ day of _____, 2023

HONORABLE NINA R. MORRISON
United States District Judge

Eastern District of New York